

WEIL, GOTSHAL & MANGES LLP  
Stephen Karotkin (*pro hac vice*)  
(stephen.karotkin@weil.com)  
Jessica Liou (*pro hac vice*)  
(jessica.liou@weil.com)  
Matthew Goren (*pro hac vice*)  
(matthew.goren@weil.com)  
767 Fifth Avenue  
New York, NY 10153-0119  
Tel: 212 310 8000  
Fax: 212 310 8007

KELLER & BENVENUTTI LLP  
Tobias S. Keller (#151445)  
(tkeller@kellerbenvenutti.com)  
Jane Kim (#298192)  
(jkim@kellerbenvenutti.com)  
650 California Street, Suite 1900  
San Francisco, CA 94108  
Tel: 415 496 6723  
Fax: 650 636 9251

*Proposed Attorneys for Debtors  
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

Bankruptcy Case  
No. 19 -30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**NOTICE OF OMNIBUS HEARING**

Date: February 27, 2019  
Time: 9:30 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

1 **PLEASE TAKE NOTICE** that on January 29, 2019 (the “**Petition Date**”), PG&E  
2 Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and  
3 debtors in possession (the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11**  
4 **Cases**”), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States  
5 Code (the “**Bankruptcy Code**”) with the United States Bankruptcy Court for the Northern District  
6 of California (San Francisco Division) (the “**Bankruptcy Court**”). A hearing was held on January  
7 31, 2019 (the “**First Day Hearing**”), where, among other things, the Bankruptcy Court granted  
8 interim relief regarding the Motions listed in Section I, below.

9 **PLEASE TAKE FURTHER NOTICE** that, the Bankruptcy Court will hold a hearing on  
10 **February 27, 2019, at 9:30 a.m. (Pacific Time)** (the “**Omnibus Hearing**”) in the courtroom of the  
11 Honorable Dennis Montali, United States Bankruptcy Judge, Courtroom 17, 16th Floor, 450 Golden  
12 Gate Avenue, San Francisco, California 94102.

13 **PLEASE TAKE FURTHER NOTICE** that a proposed agenda with respect to the Omnibus  
14 Hearing is set forth below. At the Omnibus Hearing, the Bankruptcy Court will hear the motions and  
15 applications filed by the Debtors and listed in Sections I and II of the proposed agenda below (the  
16 “**Motions**”). Copies of each pleading identified below can be viewed and/or obtained: (i) by  
17 accessing the Court’s website at <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the  
18 Clerk of the Court at 450 Golden Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors’  
19 proposed notice and claims agent, Prime Clerk LLC (“**Prime Clerk**”), at  
20 <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for U.S.-based  
21 parties; or +1 (929) 333-8977 for International parties or by e-mail at: [pgeinfo@primeclerk.com](mailto:pgeinfo@primeclerk.com).  
22 Note that a PACER password is needed to access documents on the Bankruptcy Court’s website.

23 **PLEASE TAKE FURTHER NOTICE** that any oppositions or responses to the Motions  
24 must be in writing, filed with the Bankruptcy Court, and served on the counsel for the Debtors at the  
25 above-referenced address so as to be received by no later than **February 20, 2019**. In deciding the  
26 Motions, the Court may consider any other document filed in these Chapter 11 Cases and related  
27 Adversary Proceedings.

28 **PROPOSED AGENDA FOR OMNIBUS HEARING ON**  
**FEBRUARY 27, 2019 AT 9:30 A.M. (PACIFIC TIME)**

**I. MOTIONS WHERE INTERIM RELIEF WAS GRANTED AT THE FIRST DAY**  
**HEARING AND FINAL RELIEF WILL BE SOUGHT AT THE OMNIBUS**  
**HEARING**

1. **Cash Management Motion.** Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a),  
363(b), and 507 and Fed. R. Bankr. P. 6003 and 6004 for Interim and Final Authority to (I)(A)  
Continue Existing Cash Management System, (B) Honor Certain Prepetition Obligations Related to  
the Use Thereof, (C) Continue Intercompany Arrangements, (D) Continue to Honor Obligations  
Related to Joint Infrastructure Projects, and (E) Maintain Existing Bank Accounts and Business  
Forms; and (II) Waiving the Requirements of 11 U.S.C. § 345(b) [Dkt No. 7].

2. **Insurance Motion.** Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 362(d),  
363(b), 363(c), and 364 and Fed. Bankr. P. 4001, 6003, and 6004 for Interim and Final Orders (I)

1 Authorizing the Debtors to Maintain Insurance Policies, Workers' Compensation Program, and  
2 Surety Bond Program and Pay All Obligations With Respect Thereto; and (II) Granting Relief From  
the Automatic Stay with Respect to Workers' Compensation Claims [Dkt No. 9].

3 3. **Exchange Operator Motion.** Motion of Debtors Pursuant to 11 U.S.C. §§ 105, 362,  
4 363, and 364 and Fed. R. Bankr. P. 6003 and 6004 to (A) Honor Prepetition Obligations to Natural  
5 Gas and Electricity Exchange Operators, (B) Grant Administrative Expense Claims and Authorize  
Posting of Postpetition Collateral to Exchange Operators, (C) Modify the Automatic Stay, and (D)  
Grant Related Relief [Dkt No. 15].

6 4. **Operational Integrity Suppliers Motion.** Motion of Debtors Pursuant to 11 U.S.C.  
7 §§ 105(a), 363(b), and 503(b)(9) and Fed. R. Bankr. P. 6003 and 6004 for Interim and Final  
8 Authority to Pay Prepetition Obligations Owed to Certain Safety and Reliability, Outage, and  
Nuclear Facility Suppliers [Dkt No. 12].

9 5. **Lien Claimants Motion.** Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363(b),  
10 and 503(b) and Fed. R. Bankr. P. 6003 and 6004 (I) for Interim and Final Authority to Pay  
11 Prepetition Obligations Owed to Shippers, Warehousemen, and Other Lien Claimants, and (II)  
Granting Administrative Expense Priority Status for Claims Arising from Goods Delivered to the  
Debtors Postpetition [Dkt No. 13].

12 6. **Taxes Motion.** Motion of Debtors Pursuant to 11 U.S.C. §§ 105, 363, 507(a), and  
13 541(d) and Fed. R. Bankr. P. 6003 and 6004 for Interim and Final Authority to Pay Certain  
14 Prepetition Taxes and Assessments and Granting Related Relief [Dkt No. 11].

15 7. **Customer Programs Motion.** Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a),  
16 363(b), and 507(a)(7) and Fed. R. Bankr. P. 6003 and 6004 for Interim and Final Orders (I)  
17 Authorizing Debtors to (A) Maintain and Administer Customer Programs, Including Public Purpose  
Programs, and (B) Honor Any Prepetition Obligations Relating Thereto; and (II) Authorizing  
Financial Institutions to Honor and Process Related Checks and Transfers [Dkt No. 16].

18 8. **Employee Wages and Benefits Motion.** Motion of Debtors Pursuant to 11 U.S.C. §§  
19 105(a), 363(b), and 507 and Fed. R. Bankr. P. 6003 and 6004 for Interim and Final Authority to (I)  
20 Pay Prepetition Wages, Salaries, Withholding Obligations, and Other Compensation and Benefits;  
(II) Maintain Employee Benefits Programs; and (III) Pay Related Administrative Obligations [Dkt  
No. 8].

21 9. **NOL Motion.** Motion of Debtors Pursuant to 11 U.S.C. §§ 105(A) and 362 for  
22 Interim and Final Orders Establishing Notification Procedures and Approving Restrictions on  
23 Certain Transfers of Stock of, and Claims Against, the Debtors [Dkt No. 10].

24 10. **DIP Financing Motion.** Motion of Debtors Pursuant to 11 U.S.C. §§ 105, 362, 363,  
25 364, 503 and 507 and Fed. R. Bankr. P. 2002, 4001, 6003, 6004 and 9014 for Interim and Final  
26 Orders (I) Authorizing the Debtors to Obtain Senior Secured, Superpriority, Postpetition Financing,  
(II) Granting Liens and Superpriority Claims, (III) Modifying the Automatic Stay, (IV) Scheduling  
Final Hearing, and (V) Granting Related Relief [Dkt No. 23].

1                   **II.    ADDITIONAL MOTIONS TO BE CONSIDERED AT THE OMNIBUS HEARING**

2                   11.    **Reclamation Procedures Motion.** Motion of Debtors for Entry of Order Pursuant to  
3 11 U.S.C. §§ 546(c) and 105(a) and Fed. R. Bankr. P. 9019 Establishing and Implementing  
Exclusive and Global Procedures for the Treatment of Reclamation Claims [Dkt No. 30].

4                   12.    **Section 509(b)(3) Procedures Motion.** Motion of Debtors Pursuant to 11 U.S.C.  
5 §§ 503(b)(9) and 105(a) for Entry of an Order Establishing Procedures for the Assertion, Resolution,  
and Satisfaction of Claims Asserted Pursuant to 11 U.S.C. § 503(b)(9) [Dkt No. 31].

6                   13.    **Utilities Motion.** Motion of Debtors Pursuant to 11 U.S.C. §§ 366 and 105  
7 Requesting Entry of an Order (I) Approving Debtors' Proposed Form of Adequate Assurance for  
Payment of Utility Providers, (II) Establishing Procedures Providing Adequate Assurance and  
8 Resolving Objections of Utility Providers, and (III) Prohibiting Utility Providers from Altering,  
Refusing, or Discontinuing Service [Dkt No. 32].

9                   14.    **Case Management Motion.** Motion of Debtors for Entry of Order Implementing  
10 Certain Notice and Case Management Procedures [Dkt No. 352].

11                  15.    **Interim Compensation Procedures Motion.** Motion of Debtors Pursuant to 11  
12 U.S.C. §§ 331 and 105(a) and Fed. R. Bankr. P. 2016 for Authority to Establish Procedures for  
Interim Compensation and Reimbursement of Expenses of Professionals [Dkt No. 349].

13                  16.    **Ordinary Course Professionals Motion.** Motion of Debtors Pursuant to 11 U.S.C.  
14 §§ 105(a), 327, 328, and 330 for Authority to Employ Professionals Used in the Ordinary Course of  
Business *Nunc Pro Tunc* to the Petition Date [Dkt No. 350]

15 Dated: February 6, 2019

16 **WEIL, GOTSHAL & MANGES LLP**

17 **KELLER & BENVENUTTI LLP**

18 /s/ Jane Kim

19 Jane Kim

20 *Proposed Attorneys for Debtors and Debtors in*  
21 *Possession*